

HOGAN & HARTSON
L.L.P.

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Writer's Direct Dial
(202) 637-5756

February 19, 1998

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
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FAX (202) 637-5910

BY HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

FEB 19 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

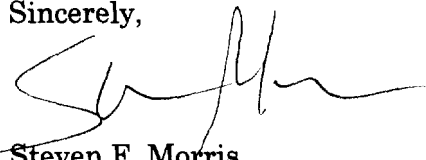
Re: Ex Parte
PR Docket No. 92-235

Dear Ms. Salas:

Attached for filing please find an original and one copy of letters from the undersigned on behalf of the American Automobile Association (AAA) to Chairman William E. Kennard, Commissioner Susan Ness, Commissioner Harold Furchtgott-Roth, Commissioner Michael K. Powell, Commissioner Gloria Tristani, and Daniel Phythyon, Chief, Wireless Telecommunications Bureau. Attached to each letter was a copy of the attached article regarding AAA's use of radio frequencies during the recent ice storms that ravaged the Northeast.

Please do not hesitate to call should you have any questions regarding this filing.

Sincerely,



Steven F. Morris

Enclosures

cc: Chairman William Kennard
Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Daniel Phythyon

No. of Copies rec'd 04
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BY HAND DELIVERY

Chairman William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services

Dear Chairman Kennard:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

As further support for AAA's position that additional protection is necessary for the Automobile Emergency frequencies, attached is a recent article from AAA's internal magazine, *Interchange*, describing AAA's efforts in connection with the recent ice storms that ravaged the Northeast United States and Canada. Despite the harsh conditions, AAA remained open for "business as usual" throughout this difficult period of time. The article notes that newspapers in the Portland, Maine area "listed AAA Northern New England numbers along with other key emergency contacts such as police and power companies." As noted by the club

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Chairman William E. Kennard

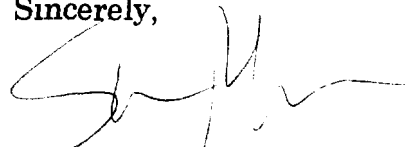
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Page 2

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Please do not hesitate to call me or Susan Pikrallidas of AAA (202/942-2061) should you have any questions with regard to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steven F. Morris", with a long horizontal flourish extending to the right.

Steven F. Morris

Counsel for the American Automobile
Association

Enclosures

cc: Ari Fitzgerald

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BY HAND DELIVERY

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services

Dear Commissioner Ness:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

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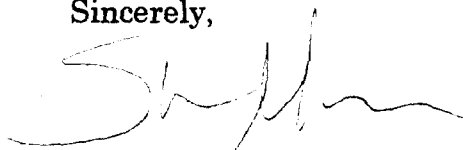
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Commissioner Susan Ness
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Sincerely,

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Steven F. Morris

Counsel for the American Automobile
Association

Enclosures

cc: David Siddall

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BY HAND DELIVERY

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services

Dear Commissioner Furchtgott-Roth:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

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Commissioner Harold Furchtgott-Roth

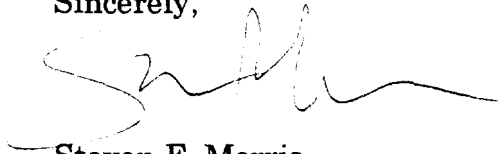
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Sincerely,

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Steven F. Morris

Counsel for the American Automobile
Association

Enclosures

cc: Kevin Martin

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BY HAND DELIVERY

Commissioner Michael K. Powell
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services

Dear Commissioner Powell:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

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Commissioner Michael K. Powell

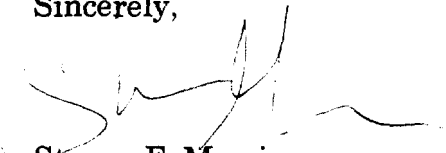
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Sincerely,



Steven F. Morris

Counsel for the American Automobile
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Enclosures

cc: Peter Tenhula

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BY HAND DELIVERY

Commissioner Gloria Tristani
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

**Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services**

Dear Commissioner Tristani:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

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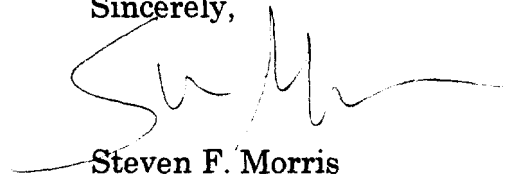
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Sincerely,

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Steven F. Morris

Counsel for the American Automobile
Association

Enclosures

cc: Karen Gulick

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February 19, 1998

BY HAND DELIVERY

Daniel Phythyon
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Re: PR Docket No. 92-235
Consolidation of Private Land Mobile Radio Services

Dear Mr. Phythyon:

On December 29, 1997, the American Automobile Association (AAA) submitted to you a White Paper explaining the valuable public safety functions performed by AAA and the importance of uninterrupted radio communications to perform those functions. The White Paper included examples of AAA's public service during times of natural disasters, and explained that AAA's continued ability to perform in this manner was threatened by the rules adopted in the Commission's *Second Report and Order* in the above-referenced docket. Consistent with AAA's Petition for Reconsideration and other filings in this docket, the White Paper concluded that additional protections were needed to ensure that there was no adverse effect on public safety as a result of the assignment of Automobile Emergency frequencies to non-auto emergency entities.

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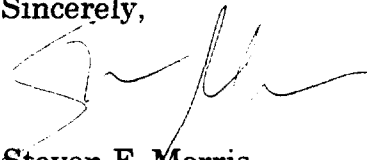
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Daniel Phythyon
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Page 2

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Sincerely,

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Steven F. Morris

Counsel for the American Automobile
Association

Enclosures

cc: D'Wanna Terry
Herb Zeiler
Ira Keltz

AAA and CAA Battle

by Edward J. Kuhn

Among AAA and CAA employees in the Northeast United States and Southeast Canada, the Great Ice Storm of 1998 will be remembered as much for personal sacrifices and everyday heroism as silent devastation.

The January storm and its aftermath plunged parts of New York, Vermont, New Hampshire, and Maine — and much of Quebec — into cold and chaos. For almost two weeks, icy rain fell, and it didn't stop until power lines, utility poles and transformers had been knocked to the ground. Hundreds of thousands of people were left without heat and electricity. Thirty-four people were killed — 20 in Canada and 14 in Maine and New York.

"At home, we lost power and there was a deathly silence punctuated by what sounded like artillery rounds," said AAA Northern New England Vice President of Finance Jim Christensen, describing the sound of trees outside his home snapping under the weight of ice.

The disaster attracted national and international media coverage. Behind the headlines were countless unheralded stories of AAA and CAA employees rising above personal inconvenience and on-the-job hardships to continue providing service to members.

Some slept in hotel rooms. Others opened their homes to fellow employees stranded without power. Many worked 10- and 12-hour days or longer, and still others not scheduled to work called to volunteer their services. Electric power gave way to portable generators and electrical extension cords.

Sue Conant, branch manager

at AAA Northern New England's hard-hit office in Auburn, Maine, said some employees turned to branch office facilities for water to wash their hair.

"It was almost a relief to come into the office so we could get our lives together," she said.

Business as Usual

Yet club sources say it was business as usual to the extent weather conditions would allow.

"Despite difficult conditions, our people were there, and we did not close our doors," said Paul Pelletier, president of CAA Quebec where some employees provided member services in cold offices with portable generators as the only source of power. "It was one of those situations where you put your shoulder to the wheel and get the job done. I'm very proud of our people and the way they responded."

Treacherous road conditions and power outages caused by the storm created driving and communication challenges for emergency road service crews. AAA Northern New England lost radio transmission towers in Maine and New Hampshire. ERS calls were dispatched by telephone.

Club President William I. McKenzie recalls one instance in which ERS drivers were unable to respond to a stranded motorist's call for help due to ice, downed power lines and trees.

"We couldn't get to him. It was frustrating. We had to call county emergency officials to respond," said McKenzie, who was forced to take a hotel room after arriving at the Portland air-

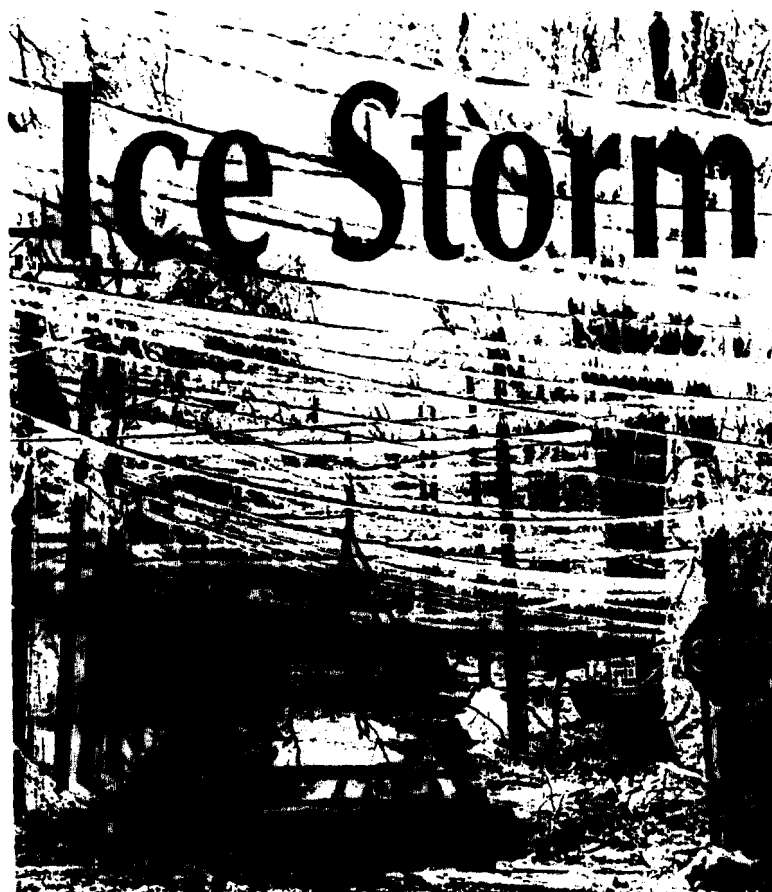
port from a business trip as the storm was intensifying. "We're accustomed to tough conditions. And we try to be prepared, but you just couldn't prepare for anything like this."

The misery and losses were so great in Canada, Pelletier said the club is considering extending memberships, without cost, for people in areas most adversely affected.

"We want to recognize the human factor and compensate them for the difficulties they've endured," he said.

That AAA and CAA clubs performed so well under adverse conditions comes as no surprise to McKenzie. During the storm, Portland area newspapers listed AAA Northern New England numbers along with other key emergency contacts such as police and power companies.

"We've always assumed a quasi-public responsibility in emergencies," McKenzie said. "When AAA is listed, that's an indicator of the important role we play. People look to us to be there — when they need us." ■



AP Photo/Dick Blume

State of emergency:

A car dodges fallen tree limbs and power lines in Watertown, N.Y., following an ice storm.